

KING & SPALDING

King & Spalding LLP
1185 Avenue of the Americas
New York, NY 10036-4003

Tel: (212) 556-2100
Fax: (212) 556-2222
www.kslaw.com
Scott Davidson
Direct Dial: 212-556-2164
sdavidson@kslaw.com

January 26, 2016

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (MG)**

Letter Regarding Update on Related Proceedings

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Judge Gerber’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically:

1. On January 21, 2016, the Second Circuit Court of Appeals scheduled March 15, 2016 as the date for oral argument in connection with the appeal of the Bankruptcy Court’s April 15, 2015 *Decision on Motion to Enforce Sale Order* [Dkt. No. 13109] (“**April 15 Decision**”), and the Judgment, dated June 1, 2015 [Dkt. No. 13177] memorializing the rulings in the April 15 Decision.
2. On January 22, 2016, a *Stipulation of Dismissal Under Fed. R. Civ. P. 41* (“**Stipulation of Dismissal**”) was entered in MDL 2543 pending in the Southern District of New York with respect to the first personal injury Bellwether Trial (*Scheuer*). A copy of the Stipulation of Dismissal is attached hereto as Exhibit “A.”

Honorable Martin Glenn
January 26, 2016
Page 2

3. On January 22, 2016, a *Stipulation For Entry Of Order Staying Action Pending Ruling By Bankruptcy Court* ("**Stay Stipulation**") was entered in the *Pilgrim v. General Motors LLC* case (Case No.: 2:15-cv-08047-JFW-E) ("**Pilgrim Lawsuit**") pending in the United States District Court for the Central District of California ("**California District Court**"), and on January 25, 2016, the California District Court entered a *Stipulated Order Staying Action Pending Ruling By Bankruptcy Court* ("**Stipulated Order**"). These documents concern the motion to enforce the Sale Order and Injunction filed by New GM with this Court on January 19, 2016 with respect to the Pilgrim Lawsuit. Copies of the Stay Stipulation and Stipulated Order are annexed hereto as Exhibits "B" and "C" respectively.

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

SD/hs
Encl.

cc: Edward S. Weisfelner
Howard Steel
Sander L. Esserman
Jonathan L. Flaxer
S. Preston Ricardo
Matthew J. Williams
Lisa H. Rubin
Keith Martorana
Daniel Golden
Deborah J. Newman
Jamison Diehl
William Weintraub
Steve W. Berman
Elizabeth J. Cabraser
Robert C. Hilliard